

REMARKS

By this amendment, Applicants have amended claims 26, 38, 45, and 50. As a result, claims 26-50 remain pending in this application. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the objections and rejections and reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, the Office rejects claims 38-50 under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. In particular, the Office alleges that the claimed inventions are “not tangibly embodied in a manner so as to be executable as the only hardware is in an intended use statement.” However, Applicants note that the “means for” language of each limitation “shall be construed to cover the corresponding structure described in the specification and equivalents thereof.” See, e.g., MPEP 2181. To this extent, Applicants note that the specification clearly states that the claimed functions can be implemented using, for example, a combination of hardware and software as shown and discussed throughout the specification. Regardless, Applicants have amended claims 38 and 45 to expressly state that the claimed invention is a computerized system. As a result, Applicants respectfully request withdrawal of this rejection.

Further, the Office rejects claims 26-27, 30, 34-35, 38, and 41-42 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,216,212 (Challenger). With respect to claim 26, Applicants have herein amended the claimed managing an abstraction layer step to clarify the claimed functionality. In particular, the abstraction layer organizes data for content

objects and defines a unique path for locating the data for each of the content objects regardless of a corresponding resource type and a corresponding file system used to store each content object. Applicants note that Challenger fails to provide such an abstraction layer. To the contrary, interpreting Challenger only for the purposes of this response, Challenger apparently uses identifiers, which do not define a unique path for locating the data for each content object regardless of a corresponding resource type and a corresponding file system used to store each content object as in the claimed invention. As a result, Applicants respectfully request withdrawal of the rejection of claim 26, and claims 27, 30, and 34-35, which depend therefrom, as allegedly being anticipated by Challenger.

With further respect to claim 26, Applicants have clarified that each object link comprises a source content object for a source website and a target content object for a destination website different from the source website. To the contrary, Challenger is concerned with caching dynamic web pages. Abstract of Challenger. Caching is used to "reduce[] the cost of creation by minimizing the frequency of regeneration of identical objects." Col. 1, lines 28-30. To this extent, each cache includes, for example, a current version of an object that depends on some underlying data. Col. 7, lines 52-57; Col. 8, lines 3-5. Consequently, Challenger is unrelated to managing an update of website content between a source content object and a target content object for two different websites. As a result, Applicants again respectfully request withdrawal of the rejection of claim 26, and claims 27, 30, and 34-35, which depend therefrom, as allegedly being anticipated by Challenger.

With respect to claim 38, Applicants note that claim 38 includes similar features as those included in claim 26. To this extent, Applicants herein incorporate the various arguments

presented above with respect to claim 26. As a result, Applicants respectfully request withdrawal of the rejection of claim 38, and claims 41-42, which depend therefrom, as allegedly being anticipated by Challenger.

Further, the Office rejects claims 28-29, 31-33, and 43-44 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Challenger in view of U.S. Patent No. 6,623,529 (Lakritz). Applicants note that the Office relies on its interpretation of Challenger with respect to claims 26 and 38, from one of which each of these claims depend. To this extent, Applicants herein incorporate the various arguments presented above with respect to claims 26 and 38. Further, Applicants note that the combination of Challenger with Lakritz, even if, *arguendo*, appropriate, fails to address the deficiencies of Challenger. As a result, Applicants respectfully request withdrawal of the rejection of claims 28-29, 31-33, and 43-44 as allegedly being unpatentable over Challenger in view of Lakritz.

Further, the Office rejects claims 36-37, 39-40, and 45-50 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Challenger in view of Lakritz. With respect to claims 36-37 and 39-40, Applicants note that the Office relies on its interpretation of Challenger with respect to claims 26 and 38, from one of which each of these claims depend. To this extent, Applicants herein incorporate the various arguments presented above with respect to claims 26 and 38. Further, Applicants note that the combination of Challenger with Lakritz, even if, *arguendo*, appropriate, fails to address the deficiencies of Challenger. As a result, Applicants respectfully request withdrawal of the rejection of claims 36-37 and 39-40 as allegedly being unpatentable over Challenger in view of Lakritz.

With respect to claim 45, Applicants note that the Office relies on its previous interpretation of Challenger as allegedly teaching the claimed object links. To this extent, Applicants herein incorporate the arguments presented above with respect to claim 26 and its claimed object links. Further, Applicants note that the combination of Challenger with Lakritz, even if, *arguendo*, appropriate, fails to address this deficiency of Challenger. As a result, Applicants respectfully request withdrawal of the rejection of claim 45, and claims 46-50, which depend therefrom, as allegedly being obvious in view of the combination of Challenger and Lakritz.

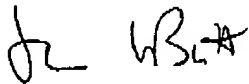
With further respect to claim 45, while Lakritz mentions "project components" and a "Project Analyzer module", Lakritz fails to disclose anything resembling the claimed project link, which defines an update relationship between a source project and a target project and comprises one of a plurality of project link types. Interpreting Lakritz only for the purposes of this response, in the portion of Lakritz cited by the Office, "project" is apparently used to refer to the process of translating documents. In sharp contrast, the claimed project comprises a set of content objects for a unique website and the claimed project link defines an update relationship between a source project and a target project. Such a project link is entirely lacking in the combination of Challenger and Lakritz. As a result, Applicants again respectfully request withdrawal of the rejection of claim 45, and claims 46-50, which depend therefrom, as allegedly being obvious in view of the combination of Challenger and Lakritz.

Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter.

Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,



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